

Deposition of Brent Ford

Royal Sleep Products, Inc. vs. Restonic Corporation

1 UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

3 ROYAL SLEEP PRODUCTS, INC.
4 a Florida Corporation,
5 Plaintiff,
6 vs.
7 RESTONIC CORPORATION, an
8 Illinois Corporation,
9 RESTONIC MATTRESS CORPORATION
10 an Illinois Corporation,
11 SLEEP ALLIANCE, LLC, a
12 Delaware Limited Liability
13 Company, ROYAL BEDDING
14 COMPANY OF BUFFALO, a New
15 York Corporation, JACKSON
16 MATTRESS CO., LLC, a North
17 Carolina Limited Liability
18 Company, CONTINENTAL
19 SILVERLINE PRODUCTS, L.P., a
20 Texas Limited Partnership,
21 STEVENS MATTRESS MANUFACTUR-
22 ING CO., a North Dakota
23 Corporation, TOM COMER, JR.,
24 an individual, DREW ROBINS,
25 an individual, and RICHARD
26 STEVENS, an individual,
27 Defendants.

Case No. 1:07 CV 6588

CERTIFIED COPY

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ORAL TELEPHONIC DEPOSITION OF

BRENT FORD

JULY 2, 2008

EXHIBIT

"B"

23 THE ORAL DEPOSITION OF BRENT FORD, produced
24 as a witness at the instance of the Plaintiff, and duly
25 sworn, was taken in the above-styled and -numbered cause

11 :21 1 other reasons why you would travel to Illinois on behalf
11 :21 2 of Continental Silverline?

11 :21 3 A. Except for that one time I told you, you
11 :21 4 know, six or seven years ago, sir, for a seminar, that
11 :22 5 would be one occasion. The only other occasion would be
11 :22 6 -- would be for pleasure, which is what you've not
11 :22 7 listed.

11 :22 8 Q. Okay. And to your knowledge, does
11 :22 9 Continental Silverline have any offices in Illinois?

11 :22 10 A. No, sir.

11 :22 11 Q. Do you know if they have any employees in
11 :22 12 Illinois?

11 :22 13 A. We had one employee, Deb Gory, that did
11 :22 14 contract stuff for us when we were installing a new
11 :22 15 computer system about a year ago; that worked for us
11 :22 16 for, I want to say, nine or ten months. I'm not sure if
11 :22 17 she was considered an employee or not, sir. I know she
11 :22 18 -- she was living there or was going to move there or
11 :22 19 something. I wasn't sure of her arrangements, but I
11 :22 20 knew she was from Illinois.

11 :22 21 Q. Now, sir -- Mister -- Mr. Ford, how did you
11 :22 22 prepare for today's deposition?

11 :23 23 A. I'm sure -- I'm not sure what your question
11 :23 24 is, sir.

11 :23 25 Q. Did you review any deposition transcripts?

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11 :29 1 A. She no longer works for us.
11 :29 2 Q. Do you know when she stopped working for
11 :29 3 Continental Silverline?
11 :29 4 A. About seven months ago.
11 :29 5 Q. Okay. Thanks. I've got no more questions.

6 EXAMINATION

7 BY MR. SALKOWSKI:

11 :29 8 Q. Mr. Ford, just one brief question. What was
11 :29 9 Ms. Gory's role? What type of work did she do on behalf
11 :29 10 of Continental Silverline?

11 :29 11 A. She helped us implement a new computer
11 :29 12 system.

11 :29 13 Q. And was that just for Continental
11 :29 14 Silverline, or was it for other licensees for Restonic?

11 :29 15 A. No. It was just for us, sir.

11 :30 16 Q. All right, sir. Thank you very much.

11 :30 17 A. Yes, sir.

18 (Deposition concluded at 3:30 p.m.)

19 MR. FRIEDBERG: Before we all hang up, I
20 just want to make sure, do we need to advise Gwen of our
21 orders for transcripts and such, or...?

22 MR. SALKOWSKI: Yeah. And, Gwen, this is
23 Robert Salkowski. We're going to need the transcript
24 and a mini.

25 THE COURT REPORTER: Okay.